

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

METRO CORPORATE CAMPUS ONE

P.O. BOX 5600

WOODBIDGE, NJ 07095-0888

(732) 549-5600 FAX (732) 549-1881

DELIVERY ADDRESS: 89 WOOD AVENUE SOUTH, ISELIN, NJ 08830-2712

INFO@GREENBAUMLAW.COM

WWW.GREENBAUMLAW.COM

FRANKLIN M. SACHS

(732) 476-3250 - DIRECT DIAL

(732) 476-3251 - DIRECT FAX

FSACHS@GREENBAUMLAW.COM

ROSELAND OFFICE:

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600

FAX (973) 535-1693

February 14, 2012

VIA FACSIMILE

Honorable Alvin K. Hellerstein, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street - Room 1050
New York, NY 10007

*Time to file opposition
is extended until
March 15, 2012.*

Al K. Hellerstein
2-15-12

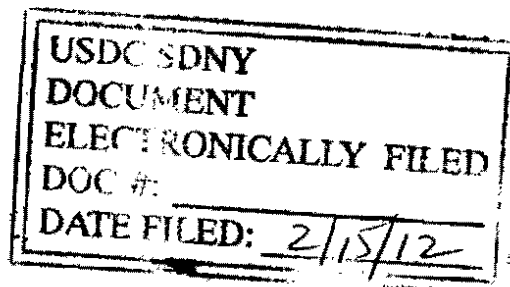
Re: In re September 11 Property Damage and Business Loss Litigation,
21-MC-101 (AKH)

Aegis Ins. Services Inc., et al. v. The Port Authority of New York, et al.
02-CV-7188 (AKH)

Dear Judge Hellerstein:

As counsel for Con Edison in this case, I write to advise you that Con Edison and Port Authority have reached a verbal settlement of this matter, subject to the drafting and execution of a formal settlement agreement.

Our brief in opposition to Port Authority's motion for summary judgment is due today. With the consent of counsel for Port Authority, we respectfully request that the Court extend our time to file our brief, if necessary, for 30 days. We expect to have the formal settlement agreement signed, and a stipulation of dismissal with prejudice filed, well before the expiration of the 30 day period.

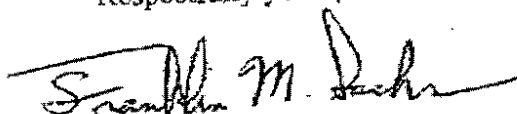


Greenbaum Rowe
Smith & Davis LLP

Honorable Alvin K. Hellerstein, U.S.D.J.
February 14, 2012
Page 2

Thank you for your consideration.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Franklin M. Sachs". The signature is fluid and cursive, with a long horizontal stroke at the end.

Franklin M. Sachs

cc: Donald A. Klein, Esq. (via electronic mail)
Mark L. Antin, Esq. (via electronic mail)